

Federal Defenders
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May 7, 2024

BY ECF

Hon. John P. Cronan
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: **United States v. Idin Dalpour**
24 Cr. 264 (JPC)

Dear Hon. Judge Cronan,

On behalf of Idin Dalpour, I write to respectfully request two bail modifications: 1) A modification permitting Mr. Dalpour to travel through the District of New Jersey on his way to his family's home in Warwick, New York (located in the Southern District of New York); and 2) a modification allowing Mr. Dalpour to travel to Fairfield, Connecticut for Mother's Day Weekend.

Mr. Dalpour was released on May 1, 2024, on a \$500,000 Personal Recognizance Bond, to be secured by property and co-signed by two financially responsible persons, with travel restricted to the Southern and Eastern districts of New York and supervision under Pre-Trial Services. His conditions were modified on May 2, 2024, to allow his temporary travel through the District of New Jersey for the purpose of visiting his family's rental home in Warwick, NY.

Mr. Dalpour requests two modifications to his bail. First, he requests permission to travel through New Jersey on his way to his family's rental home in Warwick, New York. Warwick is located in Orange County which is in the Southern District of New York and, therefore, within the zone of permitted travel. Mr. Dalpour and his family will need to make frequent trips to Warwick for the purposes of clearing out his family's rental home as they prepare to vacate it. Travel to Warwick

from Mr. Dalpour's home in Manhattan requires driving through New Jersey (as verified by Google Maps Directions). Mr. Dalpour requests permission to travel through New Jersey for any future trips to Warwick, NY.

Second, Mr. Dalpour requests permission to travel to Fairfield, Connecticut, from May 10 through May 13. Prior to his arrest, Mr. Dalpour's family planned a family gathering in Fairfield, CT, for Mother's Day weekend. Mr. Dalpour would be travelling to Fairfield with his wife and two kids. Mr. Dalpour requests a temporary modification of his bail allowing his travel to Fairfield for Mother's Day Weekend.

Pretrial Services takes no position on adding the District of NJ to Mr. Dalpour's travel restrictions and no position on Mr. Dalpour's travel to Connecticut as long as court approval is granted. The Government defers to Pretrial. As neither modification would lead to a risk of non-appearance or danger to the Community, I ask the Court to grant both modifications.

Respectfully submitted,

/s/ Zawadi Baharanyi
Zawadi Baharanyi
Assistant Federal Defenders
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The request is granted. Defendant Dalpour's bail conditions are modified to allow him to travel through New Jersey for any future trips to Warwick, New York, and to allow him to travel to Fairfield, Connecticut from May 10 through May 13, 2024, provided that he gives notice to Pretrial Services of his itinerary prior to that travel to Fairfield, Connecticut.

SO ORDERED.
May 9, 2024,
New York, New York

So Ordered:



HONORABLE JOHN P. CRONAN
UNITED STATES DISTRICT JUDGE

CC: AUSA Mathew Andrews, Esq.
PTSO Dominique Jackson